

Nicholas M. Wieczorek  
Nevada State Bar No. 6170  
CLARK HILL PLLC  
3800 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
Telephone: (702) 862-8300  
nwieczorek@clarkhill.com

Barry A. Chasnoff (admitted *pro hac vice*)  
Adam Kiehne (admitted *pro hac vice*)  
Jacob Litzenberger (admitted *pro hac vice*)  
CHASNOFF MUNGIA VALKENAAR PEPPING & STRIBLING, LLP  
1020 NE Loop 410, Suite 150  
San Antonio, Texas 78209  
Telephone: (210) 469-4155  
bchasnoff@chasnoffstribling.com  
akiehne@chasnoffstribling.com  
jlitzenberger@chasnoffstribling.com

*Attorneys for Certain Underwriters at  
Lloyd's London Subscribing to Policy No. HAH15-0632*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

MY LEFT FOOT CHILDREN'S  
THERAPY, LLC; JON GOTTLIEB AND  
ANN MARIE GOTTLIEB,  
  
Plaintiffs,  
  
v.  
  
CERTAIN UNDERWRITERS AT  
LLOYD'S LONDON SUBSCRIBING TO  
POLICY NO. HAH15-0632,  
  
Defendant.

Case No. 2:15-cv-01746- MMD- VCF

**JOINT STIPULATION TO MODIFY  
BRIEFING SCHEDULE**

Plaintiffs My Left Foot Children's Therapy, LLC, John Gottlieb and Ann Marie Gottlieb  
("Plaintiff") and Defendant Underwriters at Lloyd's London Subscribing to Policy No. HAH15-0632  
("Defendant") (together with Plaintiffs, the "parties") jointly submit this Stipulation to modify the  
time Defendant has to file a response in opposition to Plaintiffs' Motion for Partial Summary Judgment

1 (ECF No. 240, which was filed September 21, 2021 (the “**MPSJ**”), and the time Plaintiffs have to file  
2 a reply in support of their MPSJ. In support thereof, the parties state as follows:

3 WHEREAS, under Local Rule 7-2, Defendant’s deadline to file a response to the MPSJ is  
4 October 12, 2021, and Plaintiffs’ deadline to file a reply in support of the MPSJ is 14 days after service  
5 of the response;

6 WHEREAS, both parties’ counsel has been affected by significant medical issues and personal  
7 conflicts since September (*see* ECF No. 243);

8 WHEREAS, Plaintiffs have conferred with counsel for Defendant regarding the above, and  
9 requested that: (1) the deadline for Defendant to file its response to Plaintiffs’ MPSJ be moved to  
10 October 26, 2021, and (2) the reply in support of Plaintiffs’ MPSJ be moved to November 16, 2021;

11 WHEREAS, there is good cause to extend the MPSJ briefing deadlines, and this stipulation is  
12 made in good faith, and not for some impermissible purpose such as to harass, delay, or prejudice;

13 WHEREAS, this is the parties’ first request to extend the briefing deadlines;

14 NOW, THEREFORE, the parties request that the Court enter an order extending the briefing  
15 schedule for Plaintiffs’ MPSJ, so that Defendant’s Opposition is due on October 26, 2021, and  
16 Plaintiffs’ Reply is due November 16, 2021.

Respectfully submitted,

CHASNOFF MUNGIA VALKENAAR  
PEPPING & STRIBLING, LLP

AKIN GUMP STRAUSS HAUER &  
FELD, LLP

By: /s/ Adam Kiehne

Adam Kiehne  
1020 NE Loop 410, Suite 150  
San Antonio, Texas 78209  
Telephone: (210) 469-4155  
akiehne@chasnoffstribling.com

By: /s/ Shawn Hanson

Shawn Hanson  
580 California Street, Suite 1500  
San Francisco, CA 94104  
Telephone: (415) 765-9500  
shanson@akingump.com

CLARK HILL PLLC  
Nicholas M. Wieczorek  
3800 Howard Hughes Parkway,  
Suite 500  
Las Vegas, Nevada 89169  
Telephone: (702) 862-8300  
nwieczorek@clarkhill.com

MARQUIS AURBACH COFFING  
Craig R. Anderson  
10001 Park Run Drive  
Las Vegas, NV 89145  
Telephone: (702) 382-0711  
canderson@maclaw.com

*Counsel for Certain Underwriters at  
Lloyd's London Subscribing to  
Policy No. HAH15-0632*

*Counsel for Plaintiffs My Left Foot  
Children's Therapy, LLC, Jon  
Gottlieb, and Ann Marie Gottlieb*

IT IS SO ORDERED.



MIRANDA M. DU  
UNITED STATES DISTRICT JUDGE  
DATED: October 8, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of CHASNOFF MUNGIA VALKENAAR PEPPING & STRIBLING LLP, and that on this day October 8, 2021, a true and correct copy of the foregoing **Joint Stipulation to Modify Briefing Schedule** was served via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk:

Shawn Hanson  
AKIN GUMP STRAUSS HAUER & FELD LLP  
580 California Street, Suite 1500  
San Francisco, CA 94104  
Telephone: 415.765-9500  
Facsimile: 415.765-9501  
Email: shanson@akingump.com  
ngregory@akingump.com

*Counsel pro hac vice for Plaintiffs  
My Left Foot Children's Therapy, LLC,  
Jon Gottlieb, and Ann Marie Gottlieb*

Craig R. Anderson  
MARQUIS AURBACH COFFING  
10001 Park Run Drive  
Las Vegas, NV 89145  
Telephone: 702.382-0711  
Facsimile: 702.382-5816  
Email: canderson@maclaw.com

*Counsel for Plaintiffs My Left Foot  
Children's Therapy, LLC, Jon Gottlieb,  
and Ann Marie Gottlieb*

/s/ Jamie Stafford  
An Employee of CHASNOFF MUNGIA VALKENAAR  
PEPPING & STRIBLING LLP